

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**Re: D.I. 1351**

**CERTIFICATION OF COUNSEL REGARDING ORDER (I) EXTENDING TIME TO  
ASSUME OR REJECT UNEXPIRED LEASES OF NONRESIDENTIAL REAL  
PROPERTY AND (II) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certifies as follows:

1. On December 13, 2024, the Debtors filed a motion (the “**Motion**”) seeking to extend the deadline by which the Debtors must assume or reject their unexpired leases from January 7, 2025, through and including April 7, 2025. A proposed order was attached to the Motion as Exhibit A. The Court held a hearing on the Motion on January 21, 2025.

2. In accordance with the Court’s comments on the record at the hearing, the Debtors have revised the proposed order and shared the revised order with counsel to certain landlords represented separately by Ballard Spahr LLP and Fox Rothschild LLP. A copy of the revised proposed order is attached hereto as Exhibit A. Representatives from Ballard Spahr and Fox Rothschild confirmed their consent to entry of the revised proposed order.

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

3. For the convenience of the Court and all parties in interest, a redline marking the revised proposed order against the proposed order filed with the Motion is attached hereto as **Exhibit B**.

WHEREFORE, the Debtors respectfully request entry of the revised proposed order attached hereto as **Exhibit A** at the Court's earliest convenience.

*[Signature page follows]*

Dated: January 21, 2025  
Wilmington, Delaware

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